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*Attorney for Defendant Trans Union LLC*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

## LORRAINE CAMPBELL,

**Plaintiff,**

V.

TRANS UNION, LLC, EQUIFAX  
INFORMATION SERVICES, LLC, and  
JEFFERSON CAPITAL SYSTEMS, LLC.

### Defendants.

Case No. 2:24-cv-01401-APG-DJA

**JOINT STIPULATION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT  
  
(FIRST REQUEST)**

Plaintiff Lorraine Campbell (“Plaintiff”) and Trans Union LLC (“Trans Union”), by and through their undersigned counsel (collectively, “the Parties”), hereby stipulate as follows:

1. Plaintiff filed the Complaint with the Court on March 27, 2024.

2. Trans Union's responsive pleading is due on October 1, 2024.

3. Plaintiff and Trans Union are actively engaged in research and assessment of  
ff's allegations to focus their efforts on case-resolution negotiations.

Plaintiff's allegations to focus their efforts on case-resolution negotiations.

4. Plaintiff does not oppose an extension of Trans Union's time to Answer the Complaint so that the parties may devote their time to further research and assessment and focus on resolving this matter. Pursuant to Local Rule IA 6-1, Trans Union respectfully requests the Court for an extension of time to file its responsive pleading for 21 days, which is up to and including October 22, 2024.

5. The Stipulation is not meant for delay.

1       6. This is Trans Union's first extension of time, and the requested extension does not  
2 prejudice the parties.

3       7. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
4 otherwise respond to Plaintiff's Complaint up to and including October 22, 2024. This is the  
5 first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

6 Dated this 30th day of September 2024.

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8 */s/ Sarai L. Thornton*

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14 */s/ Robert M. Tzall*

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21 **ORDER**

22 The Joint Stipulation for Extension of Time for Trans Union LLC to file an answer or  
23 otherwise respond is so ORDERED AND ADJUDGED.

24 Dated this 1st day of October, 2024.

25   
26  
27 **UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of September 2024, I filed **JOINT STIPULATION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel:

Robert M. Tzall <a href="mailto:office@contemporarylegalsolutions.com">office@contemporarylegalsolutions.com</a> Contemporary Legal Solutions 2551 North Green Valley Parkway Building C, Suite 303 Henderson, NV 89014 (702) 666-0233 <i>Counsel for Plaintiff</i>	Shannon G. Splaine <a href="mailto:ssplaine@lgclawoffice.com">ssplaine@lgclawoffice.com</a> Lincoln Gustafson & Cercos, LLP 7670 W. Lake Mead Blvd., Suite 200 Las Vegas, NV 89128 (702) 257-1997 <i>and</i> James K. Schultz <a href="mailto:jschultz@sessions.legal">jschultz@sessions.legal</a> Sessions Israel & Shartle, L.L.P. 1550 Hotel Circle North, Suite 260 San Diego, CA 92108-3426 (619) 758-1891 <i>Counsel for Jefferson Capital Systems, LLC</i>
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/s/ Pouneh Porooshani

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